

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas

FILED

March 24, 2025

Nathan Ochsner, Clerk of Court

United States of America  
v.

Eduardo VIRGEN Cotardo

Case No.

4:25-mj-170

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 23, 2025 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

18 U.S. Code § 2252A(5)(B)

Offense Description

"Certain activites relating to child pornography"

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

William R. Hurst, Special Agent, HSI

Printed name and title

Sworn to before me and signed by telephone

Date: 03/25/2025

City and state: Houston, TX



Judge's signature

Dena Hanovice Palermo, US Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN THE MATTER OF:

Eduardo VIRGEN Cotardo

Case No. 4:25-mj-170

AFFADAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, William Hurst, being duly sworn, depose and state:

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), assigned to the Office of the Special Agent in Charge, Houston, Texas. I have been employed by Immigration & Customs Enforcement (ICE), Homeland Security Investigations (HSI), as an HSI agent since November 2006. I am currently assigned to the Child Exploitation Group, and as part of my daily duties as an HSI agent assigned to this group, I investigate criminal violations relating to child exploitation and child pornography including violations of Chapter 109A, Chapter 110 and Chapter 117, all contained within Title 18 of the United States Code. I have received training in the area of child pornography and child exploitation. I have also participated in the execution of search warrants and arrest warrants; a number of which involved child exploitation and child pornography offenses.

2. This affidavit is based on reports your affiant has read and conversations your affiant has had with law enforcement officers and investigators involved in this investigation. This affidavit does not set forth all of my knowledge in this matter but is intended only to show that there is probable cause to believe that Eduardo VIRGEN Cotardo is in violation of **Title 18 USC 2252A(5)(B)**, anyone who knowingly possesses, or knowingly accesses with intent to view, any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

3. On March 23, 2025, HSI Special Agent Autumn West (“SA West”) received a request for assistance from Customs and Border Protection Officers (CBPOs) at George Bush Intercontinental Airport, Houston, Texas (“IAH”) regarding a passenger arriving at IAH on an international flight named Eduardo VIRGEN Cotardo.

4. On March 23, 2025, Mexican citizen VIRGEN entered the United States at IAH on a flight originating from Mexico. CBPOs referred VIRGEN to a secondary inspection. During the secondary inspection, CBPOs viewed what they suspected to be child pornography during a border search of VIRGEN’s iPhone 16 Pro and iPad Mini.

5. The CBPOs, as part of their secondary inspection, questioned VIRGEN about his travel. VIRGEN stated he was entering the United States to attend a work training outside of Austin, Texas.

6. SA William Hurst (“SA Hurst”) responded to IAH and met with CBPOs and SA West, who briefed the special agent concerning VIRGEN’s travel and the suspected child pornography on VIRGEN’s iPhone 16 Pro and iPad Mini. CBPOs also stated they observed conversations between VIRGEN and unknown individuals discussing paying for access to children for the purpose of sexually assaulting them. In one such conversation, VIRGEN tells an unknown minor that he will pay the minor a commission for finding children his age or younger so VIRGEN can sexually assault them.

7. SA Hurst and SA West observed multiple images and videos of child pornography on VIRGEN’s iPhone 16 Pro.

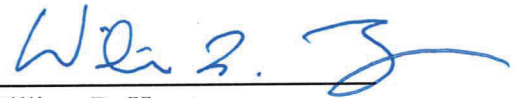
8. SA Hurst, SA West, and a CBPO conducted a recorded interview of VIRGEN. VIRGEN was advised of his Miranda Rights. VIRGEN was provided a written copy of the Miranda Warning and attested he understood his rights as were read to him and agreed to answer questions without the presence of an attorney. VIRGEN signed a voluntary waiver of his rights.

9. VIRGEN admitted to participating in chat communications with multiple individuals that discussed the sexual exploitation of children. During the interview, VIRGEN further stated that he talks about paying for access to children for the purpose of sexually assaulting them but claimed it was fantasy talk. VIRGEN also admitted he knows two of the individuals he

communicates with are minor males living in Mexico. VIRGEN stated one of the minor males sent him multiple images of child pornography. VIRGEN also admitted he has previously sexually assaulted a different sixteen-year-old male in Mexico.

The following is a description of one of the images observed on VIRGEN's iPad Mini: the image depicts a minor male bent over at the waist. The focus of the image is of the minor victim displaying his anus and genitals towards the camera.

10. Based on the foregoing information, your affiant believes there is probable cause to believe on or about March 23, 2025, VIRGEN was in violation of Title 18 USC 2252A(5)(B), "Certain activities relating to child pornography".



William R. Hurst  
Special Agent  
Homeland Security Investigations

SUBSCRIBED and SWORN to me, via telephone,  
this 25<sup>th</sup> day of March 2025, and I find probable cause



Dena Hanovice Palermo  
United States Magistrate Judge